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MEMO ENDORSED

November 15, 2019

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF (S.D.N.Y.)

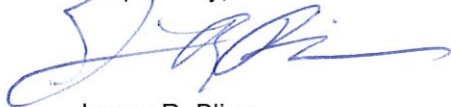
Dear Judge Failla,

We are pleased to report that the parties have reached agreement on a forbearance and the following schedule.

- November 11, 2019 to February 10, 2020: Fact discovery
- December 13, 2019: Response to the complaint
- February 20, 2020: Initial expert reports
- March 10, 2020: Rebuttal expert reports
- March 20, 2020: Conclusion of expert depositions
- April 1, 2020: Motions for summary judgement
- April 21, 2020: Oppositions to summary judgment motions
- April 30, 2020: Replies to summary judgment motions
- May 5, 2020: Hearing on summary judgment motions (subject to the Court's availability)

The parties respectfully request that this schedule be so-ordered by the Court.

Respectfully,



James R. Bliss
of PAUL HASTINGS LLP

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cc: Tariq Mundiya, Esq. (tmundiya@willkie.com)
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The Court is in receipt of the parties' proposed schedule and will so order it. The parties are directed to appear before the Court for oral argument on their summary judgment motions on May 5, 2020, at 3:00 p.m. in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York.

Dated: November 15, 2019
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE